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Interagency agreement.

## 310.01 Introduction

Project scoping is done on an ongoing basis for all projects in the Ten-Year Implementation Plan that may be scheduled to begin design or construction in the next six years. Keeping scoping current allows WSDOT to produce a six-year Capital Improvement and Preservation Program at any time to satisfy the requirements of Chapter 47.05 RCW. The results of the scoping process are used in Project Programming to prioritize projects for funding in the next budget request to the legislature (see **Chapter 320**).

Project Scoping is not to be confused with EIS scoping, which is addressed in **Chapter 411**. It involves:

- Defining the need and purpose for a project.
- Identifying and evaluating alternative solutions to find the most cost-effective and environmentally acceptable proposed solution.
- Preparing a Project Summary to document the results of the process and define the overall “scope” of the proposed solution.

Each Project Summary includes three documents:

- Project Definition – Identifies the project purpose and need, proposed solution, estimated cost (including the cost of design and construction as well as environmental review, permitting, and mitigation), and a benefit/cost ratio for the project, which includes the projected change in system performance.
- Design Decisions Summary – Identifies the current conditions and general design parameters for a proposed solution (e.g. route, length of road segment, lane width, paving depth). It also lists any deviations from design standards for the type of

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\* Web sites and navigation referenced in this chapter are subject to change. For the most current links, please refer to the online version of the EPM, available through the ESO home page: <http://www.wsdot.wa.gov/environment/>

project. Projects must meet design standards with approved deviations in order to be eligible for federal funding.

- Environmental Review Summary – Identifies potential environmental issues and impacts, any proposed mitigation, and any NEPA/SEPA documents and permits that are likely to be required. A preliminary project delivery schedule is also developed at this time in order to determine the duration of the pre-construction and construction phases for the project. A Cost Risk Assessment may be conducted (primarily on major projects) to determine the full range of potential costs.

Under NEPA and SEPA, projects are classified as either Class I (Environmental Impact Statement required), Class II (Categorically Excluded or Exempt), or Class III (Environmental Assessment or SEPA Checklist required) to determine whether environmental impacts will be significant. Under SEPA, the Class III action is roughly equivalent to making a threshold determination of non-significance. WSDOT has developed an extensive online GIS database that is useful for preliminary environmental analysis and project classification during Project Scoping (see [Section 310.06](#)).

When appropriate for budget development, each Region may also hold a project scoping meeting where draft project summaries are discussed with federal and state resource agencies, Tribes, and local municipalities. Based on their feedback, a final Project Summary is prepared so the Transportation Commission, Governor, and Legislature will understand the level of analysis and development required for each project, including the recommended level of environmental analysis (i.e., categorical exemption/exclusion, environmental assessment, or environmental impact statement).

## **310.02 Defining the Need and Purpose for a Project**

The first step in Project Scoping is to define the need and purpose for a project. Since project funding is limited to solving deficiencies identified in the Highway Systems Plan, projects that solve major deficiencies or multiple deficiencies are likely to receive a higher priority for funding in Project Programming. Therefore, it is important to identify all the deficiencies, including any environmental deficiencies, or problems, that a project might solve. Examples of environmental deficiencies include a lack of adequate existing stormwater control, habitat connectivity problems like a fish passage barrier, existing noise problems caused by the highway, and chronic environmental deficiencies like bridge scour and road washouts caused by river bank erosion. After these are identified, the overall purpose of the project, which may be to solve multiple problems, can be defined.

## **310.03 Identifying and Evaluating Alternative Solutions**

The second step in Project Scoping is to identify and evaluate alternative ways to solve the deficiencies identified in the first step. There are multiple ways to solve highway deficiencies, some of which do not even involve changes to the highway itself, and some may be more cost-effective and environmentally acceptable than others. In addition, there are often multiple ways to address each aspect of a particular deficiency, and each alternative needs to be evaluated in order to identify the best solution.

Several tools are available to assist in evaluating alternative solutions:

- Cost and Feasibility Analysis – Studies may be needed during scoping to compare alternatives in terms of their cost-effectiveness, level of benefit, and acceptance. Cost estimates for alternative solutions may be created using WSDOT's Estimate and Bid Analysis System, EBASE, and Headquarters Systems Analysis and Program Development Office has developed a list of analyses that may be appropriate for determining the feasibility and level of benefit for various types of highway projects. Information about EBASE is available on-line at:

 <http://www.wsdot.wa.gov/eesc/design/projectdev/AdReady/EBASE.htm>

- GIS Workbench – Tool for identifying and evaluating the environmental effects of alternative solutions. See **Section 310.06** for details.
- Analysis of Project Duration – WSDOT's Project Delivery Information System (PDIS) project scheduling software can be used to prepare a project schedule for each alternative. The schedule should include time required for pre-construction and construction, with particular attention to the time needed for environmental review and permitting. The PDIS is discussed online at:

 <http://www.wsdot.wa.gov/Projects/ProjectMgmt/>

In addition, some example critical path timelines for environmental work on hypothetical projects requiring different levels of environmental review are available at:

 <http://www.wsdot.wa.gov/environment/compliance>

- Cost Risk Assessment (CRA) – For major projects, the CRA may be needed to determine the full range of potential costs, or cost savings, including those associated with environmental risks and opportunities. The range of costs submitted for consideration by decision-makers should reflect any uncertainty as to whether any environmental problems will be encountered during environmental review or permitting. Examples include whether the need for an unanticipated EIS or permit may be identified during environmental review; whether an unknown hazardous material or cultural resources may be discovered during construction; or whether some cost savings might be realized, such as through partnering on mitigation. More information on CRA and WSDOT's Cost Estimating Validation Process is online at:

 <http://www.wsdot.wa.gov/Projects/ProjectMgmt/>

## **310.04 Preparing a Project Summary**

Once a proposed solution for achieving the project purpose has been identified, a Project Summary is prepared to document the results of the scoping process and define the overall scope of the proposed solution in terms of the work and material involved, including any environmental review and permitting work and mitigation, plus a cost estimate and performance outcome, and/or benefit/cost ratio, for the project. The Project Summary has three components:

- Project Definition
- Design Decisions Summary
- Environmental Review Summary

Preparation of the Project Summary ensures that regional staff have considered all major costs of the project, including both engineering and environmental factors, so a realistic budget can be prepared.

A link to the Project Definition, Design Decision Summary, and Environmental Review Summary forms is available online at:

 <http://www.wsdot.wa.gov/environment/compliance>

For details on this process, see Chapter 330 of the WSDOT *Design Manual* at WSDOT's web site:

 <http://www.wsdot.wa.gov/>

Click on Agency Publications, then Design, then Design Manual.

Or by direct link:

 <http://www.wsdot.wa.gov/fasc/EngineeringPublications/manuals/Designmanual.pdf>

For details on the Local Agency Guidelines (LAG) Project Summary process and forms, see WSDOT's web site:

 <http://www.wsdot.wa.gov/TA/Operations/LAG/LAGHP.HTM>

For details on the options for dealing with any utility relocation work, and anticipating any related environmental review and permitting work during Project Scoping, see **Exhibit 310-1**.

#### (1) **Project Definition**

The Project Definition form includes:

- Deficiencies or needs addressed by the project and whether the deficiencies are included in the 20-year Highway System Plan (or equivalent for other modes) or 10-Year Implementation Plan.
- Statement of purpose.
- Proposed strategy (description of work by road segment).
- Right-of-way or relocation requirements.
- Duration of pre-construction and construction phases.
- Estimated project costs. As stated in [Section 310.03](#), these can be derived from historical data in EBASE. However, on large, unique, or high risk projects, or projects with a lot of public attention, it may also be appropriate to conduct a Cost Risk Assessment (CRA) to determine the full range of potential costs or cost savings (including any that might be associated with environmental risks or opportunities). For instance, if there is any uncertainty as to whether any environmental problems will be encountered in environmental review or permitting (such as an EIS or unanticipated permit being required) or in construction (such as some unknown hazardous materials or cultural resources being discovered), or if some cost savings might be realized (such as through partnering on mitigation), these should

be conveyed as a range of costs for consideration by decision-makers. For more information on Cost Risk Assessment and WSDOT's Cost Estimating Validation Process, see:

 <http://www.wsdot.wa.gov/Projects/ProjectMgmt>

- Benefit/cost ratio. Benefit/cost and performance analyses are prepared for all highway projects so they can be compared and prioritized in Project Programming, and environmental considerations are a factor in the benefit/cost analyses for certain types of projects (e.g. projects that retrofit fish passage barrier culverts). For more information see the WSDOT Programming and Operations Manual at:

 [http://www.wsdot.wa.gov/FASC/EngineeringPublications/Manuals/P\\_OManual.pdf](http://www.wsdot.wa.gov/FASC/EngineeringPublications/Manuals/P_OManual.pdf)

## **(2) Design Decisions Summary**

The Design Decisions Summary is prepared with the guidance of the Design Matrix (see WSDOT's *Design Manual* (M-22-01)). Design matrices are used to identify the design level(s) for a project and the associated processes and approval authority for allowing design variances. The matrices address the majority of preservation and improvement project types and focus on those design elements that are of greatest concern for project development.

The Design Decisions Summary includes:

- Geometrics and traffic
- Access control designation
- Roadway geometric data (existing and proposed) compared to standard
- Pavement requirements
- Roadway preservation
- Roadside restoration
- Improvements (safety and hydraulics)
- Deviations from the design matrix
- Design variance inventory

## **(3) Environmental Review Summary**

The Environmental Review Summary allows the regional environmental staff to consider, at this early stage, any potential impacts and mitigation, required permits and approvals, and what form the environmental review documentation for the project will take. If the project scope is revised before the project is included in a biennial budget request, the design office consults with the regional environmental staff to verify that the environmental classification and other information is still correct.

# **310.05 Preparing the Environmental Review Summary**

The Environmental Review Summary (ERS) form is found in the Project Summary database in each Regional Office. It is completed by the regional environmental staff at the request of regional design staff. On a project that is categorically excluded or exempt (CE) under NEPA and/or SEPA, the signed ERS, with any required

documentation, is retained within the Region and serves as the environmental document for the project. For a NEPA Documented CE, which requires FHWA approval, the ERS serves as a draft document, and is replaced by an identical form, called the Environmental Classification Summary (ECS), which requires FHWA signature. This signed ECS serves as the environmental classification document for the project for FHWA purposes, as explained in [Section 310.07](#).

In completing Part 4 of the ERS, Environmental Considerations, it is advisable to attach a technical memo to explaining any assessments leading to a determination that the project should be classified as a Categorical Exemption or Documented Categorical Exemption. For guidance on the level of environmental documentation needed for a particular element of the environment, see [Chapter 420](#) through [Chapter 470](#), in the Technical Guidance section under Discipline Reports.

Instructions for completing the Environmental Review Summary are online at:

 <http://www.wsdot.wa.gov/eesc/design/projectdev/projectssummary/PSECS1.pdf>

The WSDOT GIS Workbench, which provides data needed for the “Environmental Considerations” section of the form, is described below in [Section 310.06](#). Guidance on project classification for NEPA/ SEPA purposes is found in [Section 310.07](#).

For details on required environmental review procedures, see [Chapter 410](#) through [Chapter 480](#). For details on permits and approvals, see [Chapter 510](#) through [Chapter 550](#).

## 310.06 Environmental Database Resources

### (1) *WSDOT’s GIS Workbench*

WSDOT’s GIS Workbench is an internal data system developed for use by WSDOT staff in preparing the Project Summary, particularly the “Environmental Considerations” portion of the ERS. The workbench is a user-friendly interface covering a wide range of environmental resources gathered from a variety of public agency and WSDOT sources.

The database has over 500 layers of environmental and natural resource management data, in the following major data categories:

- **General reference** – Transportation routes, political and administrative boundaries, major public lands, geographic reference.
- **Environmental data** – Air quality, fish and wildlife, priority species and habitats, geology and soils, groundwater and wells, hazardous materials, hydrography, plants, and water quality.

WSDOT users can access these data sets through the GIS Workbench. For information on how to access the Workbench, see:

 <http://www.wsdot.wa.gov/environment/envinfo/default.htm>

For a list of current data sets, see WSDOT’s web site:

 <http://www.wsdot.wa.gov/>

Click on Maps & Data, then GIS Data Distribution Catalog

Or by direct link:

 <http://www.wsdot.wa.gov/mapsdata/geodatacatalog/default.htm>

A six-hour training session has been developed to provide WSDOT staff with starter knowledge of ArcView, the GIS Workbench tool and the environmental data available through the tool.

The data provided to WSDOT staff through the GIS Workbench is sufficient for Project Summary purposes.

**(a) Accessing the GIS Workbench**

WSDOT staff wishing to access this GIS application should contact their Information Technology Manager (or equivalent), and ask for ArcView and the GIS Workbench Extension. Geographic Services provides WSDOT employees with basic training on ArcView, and the ESO provides technical support and information regarding the data available through this interface.

At this time, there are no plans to provide this interface to the general public or to WSDOT consultants.

**(b) Expansion of GIS Workbench**

GIS resources for environmental data are expanding rapidly. WSDOT staff works with federal, state, and local agencies to maintain a collection of the best available data for statewide environmental analysis. New data resources are being incorporated into the WSDOT GIS Workbench. To facilitate getting the best data into the system, please contact the ESO's Environmental Information Program with information about newly identified data resources.

**(2) What is a GIS Data Set?**

A Geographic Information System (GIS) data set is data that describes and locates geographic features and stores an Earth-based delineation of those features. GIS data sets are used to track information about things on the ground, typically organized by geographic features (e.g. stream, watershed, city, county). Using common tabular database technology, GIS links data tables and records with graphical representations (maps) of real-world features. These features are stored using coordinate values correlated with the Earth's surface. This allows tabular information to be stored as a characteristic of a place or geographic feature and then be cross-referenced to other information based on common geographic location.

**(3) Using Online GIS Databases**

The data needed for transportation project environmental impact analysis often can be retrieved from a GIS database. Many public agencies and non-governmental organizations now focus their mapping functions on building GIS databases rather than physically publishing maps or reports. For example, U.S. Fish and Wildlife Service's National Wetlands Inventory data are available through several web sites and via the WSDOT GIS Workbench.



Generally, if the online data is sufficient for the purpose, there is no need to acquire paper versions from the same agency. However, agencies often still produce and distribute standardized paper maps and reports produced using their GIS systems. They also often provide copies of the GIS data as a product.

When required data is available through a GIS, it may be reviewed either online or on paper printouts. Direct use of the GIS database enables ad hoc inquiries that generate information not found in pre-designed, standard products.

The GIS may or may not be the best available source for some environmental data. Whether the environmental data is obtained from paper products or digital ones, the information has the same value and is equally appropriate for use in reviewing projects.

**(4) *Citing a GIS Database***

The GIS data system itself should be cited as a reference whether the data is provided on paper or digitally. Proper form for citations referring to digital database is evolving, but typically includes the name of the data system, the name of the agency that maintains/updates the database, and date of the data retrieval. If the data comes from an Internet web site, the title of the site should be included with the full Uniform Resource Locator (URL).

## **310.07 Project Classification**

Based on the environmental considerations identified during preparation of the Environmental Review Summary, WSDOT projects are classified for NEPA/SEPA purposes to determine the type of environmental documentation that will be required. Projects with a federal nexus (using federal funds, involving federal lands, or requiring federal approvals or permits) are subject to NEPA and SEPA. Projects that are state funded only, with no federal nexus, can just follow SEPA guidelines. Since many WSDOT projects are prepared with intent to obtain federal funding, NEPA guidelines are usually followed. The sections below define the three classes of projects and list types of work typically found in each class, FHWA/federal agency concurrence required, and procedures for classifying and, if necessary, reclassifying projects.

**(1) *Classification System***

**(a) *NEPA Classifications***

All projects subject to NEPA are classified as either Class I, II, or III. Class I projects require preparation of an EIS because the action is likely to have significant adverse environmental impacts. Class II projects are categorical exclusions (CE) or Documented Categorical Exclusions (DCE) that meet the definitions contained in 40 CFR 1508.4. These are actions that are not likely to cause significant adverse environmental impacts. FHWA and WSDOT have agreed in a Memorandum of Understanding to a programmatic approach, classify as categorical exclusions any actions identified in 23 CFR 771.117, as long as criteria in the regulations and conditions listed in the MOU are met. Determinations made by WSDOT under this blanket classification do not require further approvals by FHWA, and will be documented in the Project Summary. Environmental classification of all projects will be identified on project authorization



submitted to FHWA but documentation for projects identified as CEs under this MOU does not need to be submitted. On DCE projects where the use of federal funds is proposed or other federal nexus is present, FHWA must review and concur with the NEPA classification as part of design approval. For guidance on these procedures see the Memorandum of Understanding (MOU) between WSDOT and FHWA on Programmatic Categorical Exclusion Approvals (May 1999).

Class III projects require an Environmental Assessment (EA) because the significance of the impact on the environment is not clearly established.

The MOU is online via the Environmental Services Office web site:

 <http://www.wsdot.wa.gov/environment/compliance/agreements.htm>



Memorandum of Understanding between Washington State Transportation Department and Federal Highway Administration, Programmatic Categorical Exclusion Approvals.

**(b) SEPA Classifications**

Under SEPA, Class I projects require an EIS; Class II projects are Categorical Exempt or require a SEPA Checklist and Threshold Determination leading to Determination of Nonsignificance; and Class III projects require a SEPA checklist and Threshold Determination leading to a Determination of Significance (DS), Determination of Nonsignificance (DNS), or Mitigated DNS. For example, a SEPA checklist may be required if additional right-of-way is acquired or environmental impacts may result from the project. See WAC 197-11 Part 3 for SEPA threshold determination criteria.

Projects classified as NEPA Categorical Exclusions (Class II) are not always categorically exempt under SEPA (WAC 197-11-305). If the project is not exempt under SEPA, WSDOT must prepare a SEPA checklist and issue a threshold determination (DS, DNS, or mitigated DNS). A NEPA Documented CE (DCE), with some additional information, may be adopted for SEPA and support a DNS, under the NEPA Documented Categorical Exclusions Implementing Agreement with Ecology (June 1996).

For NEPA Class III projects, WSDOT may adopt the NEPA EA to satisfy the SEPA requirement for a DNS. For a state-funded project, if a SEPA checklist supports a DNS, no EIS is required.

The Implementing Agreement is online via the Environmental Services Office web site:

 <http://www.wsdot.wa.gov/environment/compliance/agreements.htm>



Implementing Agreement between the Washington State Transportation Department and the Washington State Department of Ecology Concerning Adoption of NEPA Documented Categorical Exclusions.

**(2) Class I Projects (EIS)**

Class I projects are actions that are likely to have significant impact on the environment because of their effects on land use, planned growth, development patterns, traffic volumes, travel patterns, transportation services, natural resources, or because they are apt to create substantial public controversy. An EIS may follow an EA if significant impacts are discovered during preparation of an EA, or may be prepared without an EA if it is evident that the project will have significant impacts. See [Section 411.06](#) through [Section 411.09](#) for details on EIS documents and procedures and general guidance on preparing an EIS.

Examples of projects that usually require an EIS, as defined in 23 CFR 771.115, are:

- New controlled-access freeway.
- Highway project of four or more lanes in a new location.
- New construction or extension of fixed rail transit facilities (e.g., rapid rail, light rail, commuter rail, automated guideway transit).
- New construction or extension of a separate roadway for buses or high-occupancy vehicles not located within an existing highway facility.
- Although examples are given, it is important to remember that the size and significance of the potential impacts determine the need for an EIS, not the size of the project.

Class I projects that impact waters of the United States or waters of the state and require a Section 10 permit or a Section 404 permit from the U.S. Army Corps of Engineers (Corps) must follow the requirements of the Signatory Agency Committee (SAC) Agreement to Integrate Aquatic Resources Permit Requirements into the NEPA/SEPA Process (formerly known as the “NEPA/404 Merger Agreement”). This agreement applies to all transportation construction projects in the state of Washington requiring a Corps Section 404 permit and FHWA action under NEPA and/or WSDOT action under SEPA. See [Section 411.06](#) for details on the agreement and [Section 520.02](#) and [Section 520.03](#) for details on Section 404 and Section 10 permits.

**(3) Class II Projects – Categorical Exclusions (CE and DCE)**

Categorical Exclusions are actions that meet the definition contained in NEPA rules (40 CFR 1508.4) and, based on past experience with similar actions, do not involve significant environmental impacts. Unless specifically requested by other agencies or the public, these actions do not require an EIS or an EA.

Categorical Exclusions are actions which do not induce significant impacts to planned growth or land use for the area; do not require the relocation of significant numbers of people; do not have a significant impact on any natural, cultural, recreational, historic, or other resource; do not involve significant air, noise, or water quality impacts; do not have significant impacts on travel patterns; or do not otherwise, either individually or cumulatively, have any significant environmental impacts.

Class II projects are defined further by two fixed subcategories as described below. The subcategory determines the documentation and approval required.

(a) ***Class II projects not requiring documentation for FHWA concurrence (CE)***

Projects in this subcategory, Categorical Exclusions (CE), meet the requirements of the MOU between WSDOT and FHWA on Programmatic Categorical Exclusion Approvals. A copy of this MOU is available online at:

 <http://www.wsdot.wa.gov/environment/compliance/agreements.htm>

The only NEPA documentation required is a signed Environmental Review Summary that is included in the Project Summary package sent to Headquarters. No other NEPA documentation or approval by FHWA is required. However, some CE projects may require a Biological Assessment (BA), which may result in a “Letter of No Effect” on endangered species or habitat (see [Section 436.05](#)). If “No effect” is documented, the projects may qualify for inclusion under the MOU on Programmatic Categorical Exclusion Approvals.

Examples of CE projects are found in 23 CFR 771.117(c) at the FHWA web site below:

 <http://www.fhwa.dot.gov/>

Click on Legislation and Regulations, then FHWA Directives and Policy Memorandums, then Federal-Aid Policy Guide, then Title 23 CFR, then 771, then 771.117.

Or, for a summary:

Click on FHWA Programs, then Environment, then NEPA Project Development, then Documentation, then Categorical Exclusion.

Or by direct link:

 <http://environment.fhwa.dot.gov/projdev/docuce.htm>

(b) ***Class II projects requiring documentation and FHWA concurrence (DCE)***

For projects in this subcategory, Documented Categorical Exclusions (DCE), additional environmental documentation is required and FHWA approval must be obtained before the design file can be approved. All environmental documentation must be completed before finalizing the Plans, Specifications, and Estimates (PS&E) package and going to ad. If indicated by the Environmental Review Summary (ERS), preliminary environmental studies are completed. The ERS is then renamed the Environmental Classification Summary (ECS), signed by the WSDOT Regional Environmental Manager, and sent with federal permits and/or documentation to FHWA for approval.

After obligation of project design (PE) funds, detailed environmental studies for CE documentation may be required for DCE projects to determine the environmental, economic, and social impacts. WSDOT then finalizes the ECS and submits it to FHWA for final approval. Examples of DCE projects are found in 23 CFR 771.117(d) at the FHWA web site below:

 <http://www.fhwa.dot.gov/>

Click on Legislation and Regulations, then FHWA Directives and Policy Memorandums, then Federal-Aid Policy Guide, then Title 23 CFR, then 771, then 771.117.

Or, for a summary:

Click on FHWA Programs, then Environment, then NEPA Project Development, then Documentation, then Categorical Exclusion.

Or by direct link:

 <http://environment.fhwa.dot.gov/projdev/docuce.htm>

Any action that would normally be classified as a CE or DCE but could involve unusual circumstances will require the applicant, in cooperation with the FHWA, to conduct appropriate environmental studies to determine if the CE classification is proper. Such unusual circumstances include:

- Significant environmental impacts.
- Substantial controversy on environmental grounds.
- Significant impact on properties protected by Section 4(f) of the DOT Act or Section 106 of the National Historic Preservation Act (see [Section 411.12](#), [Section 455.02](#), and [Section 456.02](#)).
- Inconsistencies with any federal, state, or local law or administrative determination relating to the environmental aspects of the action.

**(4) Class III Projects – Environmental Assessment (EA)**

When the significance of the impact of a proposed project on the environment is not clearly established, an EA is prepared to determine the extent of environmental impact and to determine whether an EIS is needed. WSDOT may adopt the EA to satisfy requirements for a SEPA DNS, but the EA will not satisfy the SEPA EIS requirement. Under RCW 43.21C.150, compliance with SEPA is not required where there has been a “detailed statement” prepared under NEPA, but an EA is generally not a detailed document. Refer to the definitions of each 40 CFR 1508.9 and 40 CFR 1508.11. No EIS is required when the EA supports a NEPA Finding of No Significant Impact (FONSI). See [Section 411.05](#) for details on EA documentation and procedure.

**(5) Classification Procedure**

**(a) NEPA Classification Procedure**

The NEPA documentation procedure occurs in several stages during project development. Generally, the path is as follows: Scoping/ERS documents, evolving to Design/ECS documents, evolving to PS&E/Permit documents, evolving to Construction.

The procedure for NEPA classification is as follows:

- Once the project has been sufficiently developed to assess any environmental impacts, the Region completes the ERS based on the best information available at the scoping stage.

- The Regional Environmental Manager then concurs with the classification by signing the ERS and the completed form is returned to the design office for inclusion in the Project Summary package.
- If a project is determined to be a Categorical Exclusion (NEPA-CE), the NEPA environmental review process is considered complete. If it is determined that a Documented CE, EA, or EIS is required, the Region evaluates the project schedule and arranges for preparation of the appropriate document.

**(b) SEPA Classification Procedure**

SEPA requires no documentation with regard to categorical exemptions; therefore, the region is responsible for verifying and monitoring these projects to assure that all necessary environmental documentation is completed. The procedure for SEPA projects is as follows:

- Once the project has been sufficiently developed to assess any environmental impacts, the region completes the ERS based on the best information available.
- The Regional Environmental Manager then concurs with the classification by signing the ERS and the completed form is returned to the design office for inclusion in the Project Summary package.
- On projects funded entirely with state funds, this ends the environmental classification process. On projects that are categorized as exempt from SEPA, the environmental process is complete, unless the project requires biological evaluation to comply with the Endangered Species Act (see [Section 436.05](#)). On projects categorized as needing a SEPA checklist or EIS, those documents are prepared prior to design approval.

**(6) Revision of Project Scope and Classification**

See [Section 411.13](#) for details on project re-evaluation and preparation of supplementary environmental documentation if warranted by the re-evaluation.

**(a) NEPA Reclassification**

Since FHWA must concur with the NEPA classification, any major change in a project classification for a project involving federal funds requires the processing of a revised ECS form. Minor changes may be handled informally, if FHWA concurs.

**(b) SEPA Reclassification**

When the scope of a project changes, a revised ERS is usually required. As part of that revision, the environmental classification needs to be reassessed. The decision on whether or not to revise the ERS is made by the regional environmental office in coordination with the region program management office. For many minor scope changes, a new ERS is not required. However, note to the file or a follow-up memo should then be prepared to document the revision.

In some cases, new circumstances may cause a change in the environmental classification but not a change in scope. Any changes in classification are documented by a note to the file or a follow-up memo.

### **310.08 Project Scoping Meetings**

When appropriate for budget development, each region may hold a project scoping meeting where draft project summaries are discussed with federal and state resource agencies, tribes, and local municipalities. Based on their feedback, a final Project Summary is prepared so the Commission and Legislature will understand the level of analysis and development required for each project, including the recommended level of environmental analysis (i.e., categorical exemption/exclusion, environmental assessment, or environmental impact statement).

### **310.09 Exhibits**

*[Exhibit 310-1 – Environmental Review and Permitting for Utility Relocation.](#)*

